

1 GABRIELLE M. WIRTH - SBN 106492  
wirth.gabrielle@dorsey.com  
2 PAVLINA K. RAFTER - SBN 304181  
rafter.pavlina@dorsey.com  
3 DORSEY & WHITNEY LLP  
600 Anton Boulevard, Suite 2000  
4 Costa Mesa, CA 92626  
Telephone: (714) 800-1400  
5 Facsimile: (714) 800-1499

6 | Attorneys for Defendant  
CANON INFORMATION TECHNOLOGY SERVICES, INC.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

12 STEPHANIE NICOLE GONZALEZ-COLON, as an individual,

13

Plaintiff.

V.

16 FRASCO, INC. d/b/a  
17 FRASCOPROFILES, CANON  
18 INFORMATION TECHNOLOGY  
SERVICES, INC, and DOES 1-10  
inclusive.

## Defendants

CASE NO. 2:25-CV-04414

Hon. Maame Ewusi-Mensah Frimpong  
Courtroom 8B

[Los Angeles Superior Court Case No.  
25NNCV02482]

**DECLARATION OF BRIAN GRIGGS  
IN SUPPORT OF DEFENDANT  
CANON INFORMATION  
TECHNOLOGY SERVICES, INC.'S  
NOTICE OF MOTION AND MOTION  
TO DISMISS PLAINTIFF'S  
COMPLAINT**

[Filed concurrently with Notice of Motion and Motion; Memorandum of Points and Authorities; Declaration of Pavlina Rafter, and [Proposed] Order]

**DATE:** August 14, 2025  
**TIME:** 10:00 A.M.  
**PLACE:** United States Courthouse  
350 West First Street  
Los Angeles, CA 90012  
Courtroom 8b, 8th Floor

Complaint Filed: April 10, 2025  
Trial Date: Not Set

1                   **DECLARATION OF BRIAN GRIGGS**

2                   I, BRIAN GRIGGS, declare as follows:

3                   1. I am a Vice-President at Canon Information Technology Services, Inc.  
4 (“CITS”), Defendant in the above-captioned action. I give this Declaration in support  
5 of the Motion to Dismiss filed by CITS based on my personal knowledge and could  
6 competently testify thereto if called upon to do so.

7                   2. CITS is incorporated in Virginia. CITS has its headquarters and  
8 principal place of business at 850 Greenbrier Cir, Chesapeake, Virginia, 23320.  
9 CITS has never been incorporated in California and has never had its principal place  
10 of business or headquarters in California.

11                  3. I am aware that the majority of CITS’s corporate officers work in  
12 CITS’s Chesapeake, Virginia office. Defendant also files its corporate income tax  
13 returns in the state of Virginia, and maintains the bulk of its corporate records in  
14 Virginia.

15                  4. CITS does not lease, own, or operate any offices in California, nor does  
16 it have any operations or employees in California. Accordingly, CITS is not  
17 registered to do business in California. The large majority of CITS’s roughly 267  
18 employees work from its facilities in Chesapeake, Virginia or remotely from within  
19 Virginia. The remaining employees work remotely in one of the following states:  
20 Colorado, Florida, Georgia, Iowa, Illinois, Indiana, Louisiana, Massachusetts, North  
21 Carolina, New Mexico, New York, Ohio, South Carolina, Tennessee, Virginia or  
22 West Virginia, but report to other employees who work at CITS’s offices in Virginia.

23                  5. The CITS Employee Development & Talent Acquisition Specialist who  
24 requested the background check report from Defendant Frasco in connection with  
25 Plaintiff’s application for employment with CITS is located in Chesapeake, Virginia.  
26 The CITS employees who evaluate job applications and background check reports,  
27 and who initiate the transmittal of pre-adverse action notices, are located in Virginia.

1 None of the CITS functions relevant to Plaintiff's job application or claims against  
2 CITS took place in California.

3       6. Based upon the employment application Plaintiff submitted to CITS in  
4 or about April 8, 2023, Plaintiff was a resident of Tampa Florida at the time she  
5 submitted her employment application. The position for which she applied,  
6 Representative, Tech Support I, is a position approved for remote work in Florida.  
7 In order to be eligible for a remote role the successful candidate would need to reside  
8 in any of Colorado, Florida, Georgia, Iowa, Illinois, Indiana, Louisiana,  
9 Massachusetts, North Carolina, New Mexico, New York, Ohio, South Carolina,  
10 Tennessee, Virginia, or West Virginia.

11       7. No other previous Motion to Dismiss has been filed in or made to this  
12 Court in the matter for the relief sought herein.

13

14       I declare under penalty of perjury under the laws of the United States of  
15 America and the State of California that the foregoing is true and correct. Executed  
16 this 4th day of June 2025, at Chesapeake, Virginia.

17

18



19 \_\_\_\_\_  
20 BRIAN GRIGGS

21

22

23

24

25

26

27

28

**CERTIFICATE OF SERVICE**

All Case Participants are registered for the USDC CM/ECF System

***Stephanie Nicole Gonzalez-Colon v. Frasco, Inc. D/B/A Frascoprofiles,  
Canon Information Technology Services, Inc  
United States District Court  
Central District of California – Western Division  
Case No.: 2:25-CV-04414***

**DECLARATION OF BRIAN GRIGGS IN SUPPORT OF DEFENDANT  
CANON INFORMATION TECHNOLOGY SERVICES, INC.'S NOTICE OF  
MOTION AND MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

I hereby certify on June 4, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Central District of California by using the CM/ECF System.

Participants in the case who are registered CM/ECF Users will be served by the CM/ECF System.

DATED: June 4, 2025 DORSEY & WHITNEY LLP

By: /s/Pavlina K. Rafter  
Pavlina K. Rafter